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6 Attorneys for Defendants  
7 VWR International LLC; Avantor, Inc.; and  
Avantor Performance Materials, Inc.  
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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA

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12 EMMANUEL ZARCO, ) **Case No. 4:20-cv-00089-HSG**  
13 Plaintiff, ) **STIPULATION AND ORDER TO**  
14 vs. ) **EXTEND DISCOVERY AND ADR**  
15 VWR INTERNATIONAL, LLC; ) **DEADLINES**  
16 AVANTOR, INC.; AVANTOR )  
17 PERFORMANCE MATERIALS, INC.; and )  
DOES 1 to 25, inclusive )  
18 Defendants. )  
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**STIPULATION**

Plaintiff Emmanuel Zarco (“Plaintiff”) and Defendants VWR International, LLC, Avantor, Inc., and Avantor Performance Materials, Inc. (“Defendants”) hereby stipulate as follows:

WHEREAS, the Court’s Scheduling Order and Order Selecting ADR Process (Dkt. Nos. 21, 30) presently set, *inter alia*, the following schedule for discovery and mediation:

- 1) Close of Fact Discovery: November 15, 2020
- 2) Opening Expert Reports: December 1, 2020
- 3) Date to Conclude Mediation: December 31, 2020
- 4) Rebuttal Expert Reports: January 15, 2021
- 5) Close of Expert Discovery: February 26, 2021; and

WHEREAS, in light of scheduling constraints on the parties and counsel and in order to provide adequate time under the circumstances for the conduct of fact and expert discovery in this action, and to orderly stage discovery in a manner so as to avoid incurring unnecessary expense should this matter be amenable to settlement, the Parties agree that a continuance of the above deadlines is appropriate;

WHEREAS, the requested continuance will not impact the trial or summary judgment hearing dates, or require any further continuance of deadlines ordered by the Court previously;

NOW, THEREFORE, the Parties stipulate and request that the Court Order that the following case deadlines should be continued as follows:

- 1) Close of Fact Discovery: December 31, 2020
- 2) Opening Expert Reports: March 1, 2021
- 3) Date to Conclude Mediation: January 31, 2021
- 4) Rebuttal Expert Reports: April 15, 2021
- 5) Close of Expert Discovery: May 26, 2021

1 SO STIPULATED.

2 Dated: October 20, 2020

THE ERLICH LAW FIRM  
JASON ERLICH

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5 By /s/ Jason Erlich  
Attorneys for Plaintiff Emmanuel Zarco

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7 Dated: October 20, 2020

GLYNN & FINLEY, LLP  
ADAM M. RAPP

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10 By /s/ Adam M. Rapp  
Attorneys for Defendants

11 VWR International LLC; Avantor, Inc.;  
12 and Avantor Performance Materials, Inc.  
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**ORDER**

Pursuant to the foregoing stipulation of the Parties, and good cause appearing therefor, IT IS HEREBY ORDERED that the following pretrial deadlines set forth in the Court's Scheduling Order and Order Selecting ADR Process (Dkt. Nos. 21, 30) are hereby continued as follows:

- 1) Close of Fact Discovery: December 31, 2020
- 2) Opening Expert Reports: March 1, 2021
- 3) Date to Conclude Mediation: January 31, 2021
- 4) Rebuttal Expert Reports: April 15, 2021
- 5) Close of Expert Discovery: May 26, 2021

IT IS SO ORDERED.

Date: 10/21/2020

  
HON. HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE